



MARY E. TOSCANO  
PARTNER  
75 LIVINGSTON AVENUE  
SUITE 301  
ROSELAND, NJ 07068  
P: 973-577-1822  
F: 973-577-1823  
[MTOSCANO@GREENBAUMLAW.COM](mailto:MTOSCANO@GREENBAUMLAW.COM)

July 24, 2025

**FILED VIA ECF**

Honorable Madeline Cox Arleo U.S.D.J.  
United States District Court  
50 Walnut Street  
Newark, New Jersey 07102

**Re: *Wiziari Johnson*, Criminal Number 24-710 (MCA)**

Dear Judge Arleo:

I am writing to respectfully request that the Court adjourn the current pretrial motions deadline of July 28, 2025. As the Court well knows, at a status conference held on July 10, 2025, the government represented that it had scheduled grand jury time to seek a Superseding Indictment. The government represented that the grand jury presentation was scheduled for July 24, 2025, which would have allowed undersigned counsel to either forego filing pretrial motions if a Superseding Indictment was, in fact, returned, or to file motions germane to the Indictment before the July 28, 2025 deadline if a Superseding Indictment was not returned.

Earlier this afternoon, counsel for Mr. Johnson learned that, for reasons that were beyond the government's control, the grand jury presentation had to be rescheduled for July 29, 2025. As a result, under the current pretrial motion deadline, counsel would have to file motions before the return of a Superseding Indictment, thereby prejudicing Mr. Johnson by requiring him to reveal his trial strategy in advance of the new grand jury presentation date. Moreover, requiring counsel to file pretrial motions the day before learning whether a Superseding Indictment was returned would result in the waste of Criminal Justice Act funds by requiring counsel to prepare and file potentially unnecessary motions. As a result, Mr. Johnson requests that the current pretrial motions deadline be adjourned until August 5, 2025.

Notably, the government does not have any objection to this adjournment request.

Very Truly Yours,  
**GREENBAUM, ROWE, SMITH & DAVIS, LLP**



Mary E. Toscano